

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

<p>In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of</p> <p>THE COMMONWEALTH OF PUERTO RICO, et al.,</p> <p>Debtors.<sup>1</sup></p> <hr style="border: 0.5px solid black;"/> <p>In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of</p> <p>THE PUERTO RICO ELECTRIC POWER AUTHORITY (PREPA)</p>	<p>PROMESA Title III</p> <p>No. 17 BK 3283-LTS  (Jointly Administered)</p> <p>This filing relates to PREPA POC 28744 PROMESA Title III Case No. 17 BK4780-LTS</p>
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**MOTION FOR LEAVE TO AMEND PROOF OF CLAIM NUMBER 28744**

To the Honorable United States District Judge Laura Taylor Swain:

COMES NOW, creditor, **O'Neill Security & Consultant Services, Inc.** (hereinafter "O'Neill"), by and through the undersigned attorney, to respectfully state, and request:

1. On May 29, 2018, O'Neill filed a proof of claim number 28744 based on a debt owed by PREPA for services rendered by O'Neill for the amount of \$1,946,485.38

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

as of July 2, 2017. After the proof of claim was filed, O'Neill received payments from the debtor that reduced the amount owed by PREPA to O'Neill. Therefore, O'Neill requests permission to amend POC to reduce the amount of the original POC from \$1,946,485.38 to \$829,183.42.

2. Permission to amend proofs of claim shall be freely given when justice so requires (internal quotation marks omitted). In re Roper & Twardowsky, LLC, Case No.: 15-32878 (SLM), at \*27 (Bankr. D.N.J. July 5, 2017).

3. That this request shall in no way negatively affect or limit the rights of any of the Debtors or the Financial Oversight and Management Board for Puerto Rico, as representative for the Debtors pursuant to PROMESA, or any other party in interest in the Title III cases to object to the Claims on any basis whatsoever or otherwise assert any defenses whatsoever with respect to the Claims. On the contrary, this request benefits the Debtors since we are requesting leave to amend and reduce the claim amount.

**WHEREFORE**, it is respectfully requested that this Honorable Court grants movant leave to amend its proof of claim number 28744 to correct the reduced claim amount with any other remedy deemed just and proper.

**I HEREBY CERTIFY** that on this date, in accordance with Fed. R. Bankr. P. 9014(b), Fed. R. Bankr. P. 7004(b), we electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to counsels of record.

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**RESPECTFULLY SUBMITTED.**

In Ponce, Puerto Rico, on this 30th day of October 2022.

s/Elías L. Fernández Pérez  
ELÍAS L. FERNÁNDEZ PÉREZ  
USDC 227404  
PO Box 7500  
Ponce, P.R. 00732  
Tel. (939) 250-0179  
Cel. (787) 616-9374  
Fax: 1(800) 325-7084  
Email: [eliaslaureano@gmail.com](mailto:eliaslaureano@gmail.com)